



# SKAGIT 911

Serving the Citizens of Skagit County

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September 6, 2005

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW Washington, DC 20554

RE: WT Docket 05-196

Greetings:

Skagit 911 Communications Center is the primary Public Safety Answering Point (PSAP) in Skagit County, WA. We answer 9-1-1 calls for a population of over 105,000 and we dispatch police, fire and emergency medical service units to the citizens and guests in crisis in our county.

On behalf of The Emergency Management Council of Skagit County and Skagit 911, we strongly support the FCC's ruling to require interconnected VoIP providers to ensure they are able to deliver accurate location and call back information to the PSAP when their customers call 9-1-1.

It is imperative that we have every resource available to us to find callers when they are unable to provide accurate locations during their time of crisis. In the customer's excitement over new, low-cost telephone service, they may not fully understand the problems of this new service. Their VoIP phone will look like any other telephone however, it won't provide the same services. Even if the phone's owner understands the service limitations for 9-1-1, visitors or others in the home will expect the phone to provide them with access to E9-1-1 service when they call in an emergency. In a crisis, the phone's owner may also forget about the limitations and not be able to reach emergency services for help when they most need it. We have already encountered confusion and frustration from callers whose calls were not routed into our PSAP and an emergency response was delayed. The citizens of our communities have an expectation that any functioning telephone will reach 9-1-1 in an emergency.

We ask that the Commission not extend the 120 day deadline for interconnected VoIP providers to provide enhanced 9-1-1 services to their customers as they were very aware of this problem and failed to act prior to saturating the market with these devices. Please ensure that any requirements imposed on VoIP providers does not cause undue burden on a PSAP's ability to process and dispatch an emergency response to a 9-1-1 call. Finally, please ensure that the Commission's rules take in to consideration the operational requirements of the current PSAP infrastructure and not impose rules that will require considerable upgrades or replacement of PSAP equipment.

Sincerely,

Deb Welsh  
Interim Director

Cc: Emergency Management Council of Skagit County  
APCO International Office of Government Affairs